

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

SOUND AROUND, INC., d/b/a PYLE USA,

Plaintiff,

v.

**SHENZHEN KEENRAY INNOVATIONS
LIMITED, DANXIA WU, WENG FENG
PENG (a/k/a FENSON PENG), and
AMAZON.COM, INC**

Defendants.

Civil Action No: 22-cv-06943-HG

I, Danxia Wu, declare and state as follows:

1. I am over 18 years of age and have knowledge of the facts set forth herein. I make this declaration based on my personal knowledge. If called as a witness, I could and would testify to the statements made herein.

2. I live in Shenzhen, China.

3. I am not registered to do business in New York.

4. I do not maintain a registered agent for service of process in New York.

5. I have no offices, employees, or agents, facilities or mailing addresses in New York.

6. I do not have any telephone listings in New York.

7. I do not own, use, or possesses any real or personal property in New York.

8. I have never paid taxes in New York.

9. I have never held any bank accounts in New York.

10. I do not maintain any corporate files in New York.
11. I have never warehoused or stored inventory in New York.
12. I have never directed advertising or marketing toward New York.
13. I have never entered into any contracts with a person or corporate entity located in New York.
14. I have never conducted any directors' meetings in New York.
15. I have never purchased goods or services from anyone in New York.
16. I have never contacted any internet service provider in New York.
17. I have never consented to jurisdiction in New York.
18. I began to design the Blanket Towel Warmer since December 2019. True and correct copy of the design documents are attached hereto as Exhibit A.
19. On November 10, 2020, I used my design in conjunction with my application for design patent.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on February 7, 2023

Danxia Wu

Danxia Wu